

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

MARTHILDE BRZYCKI, )  
)  
Plaintiff(s), )  
)  
vs. ) 2:18-cv-01582-MJP  
)  
HARBORVIEW MEDICAL CENTER, and )  
UNIVERSITY OF WASHINGTON, )  
)  
Defendant(s). )

DEPOSITION UPON ORAL EXAMINATION OF  
RACHEL (VARGAS) STERNOFF, ARNP

Taken at 1135 116th Avenue NE, Suite 200  
Bellevue, Washington

DATE TAKEN: NOVEMBER 5, 2019

REPORTED BY: PATSY D. JACOY, CCR 2348

1 experiencing some distress or something that's causing  
2 them concern and they tell you why they think it's  
3 causing them those issues, would you typically write  
4 that down?

5 A. Typically, yes.

6 Q. Okay. Sitting here today and we're -- let's  
7 look at what you wrote on the Assessment/Plan, which is  
8 on the first and second page of Exhibit 1, it's four --  
9 there's four bullet points there.

10 A. Uh-huh.

11 Q. Anxiety, insomnia, subclinical  
12 hyperthyroidism?

13 A. Uh-huh.

14 Q. And elevated blood pressure?

15 A. Yeah.

16 Q. Are those all things that you wrote?

17 A. Yes, they are.

18 Q. Okay. And do you have any recollection of  
19 your assessment of Ms. Brzycki other than what you  
20 wrote here in this chart note?

21 A. No.

22 Q. Okay. And in the anxiety section you wrote:  
23 Situational anxiety secondary to stressful work  
24 situation?

25 A. Correct.

1 **stress. And below that you wrote: See plan noted**  
2 **above. What did you mean by that?**

3 A. When I put in documentation with diagnoses,  
4 the way that I document it will pull in each diagnosis  
5 and if I feel that something is redundant, I will still  
6 want to put the diagnosis there, but I'm not going to  
7 repeat myself. And so I just put -- said: See plan  
8 noted above.

9 **Q. Okay. So I should back up. The -- the bold**  
10 **portions of the assessment/plan where it says**  
11 **"situational anxiety and work-related stress," are**  
12 **those diagnoses?**

13 A. Yes.

14 **Q. So you diagnosed her with situational anxiety?**

15 A. Correct.

16 **Q. And you diagnosed her with work-related**  
17 **stress?**

18 A. Correct.

19 **Q. Okay. And on the -- so the same thing would**  
20 **be true for the prior chart note, Exhibit 1, under**  
21 **Assessment/Plan you have four diagnoses at that time,**  
22 **right?**

23 A. Correct.

24 **Q. Anxiety; insomnia, unspecified type;**  
25 **subclinical hyperthyroidism; and elevated blood**

1 **pressure?**

2 A. Correct.

3 **Q. And the diagnosis of work-related stress, what**

4 **was your basis for that?**

5 A. Reported anxiety related to work.

6 **Q. Is that based upon -- well, she hadn't been at**

7 **work, right?**

8 A. Correct, but in my note I referenced that once  
9 she started getting calls from work the week prior,  
10 it -- her blood pressures -- average blood pressure  
11 started to increase again.

12 **Q. So even though she hadn't been at work, the**  
13 **mere receipt of phone calls from work increased her**  
14 **blood pressure?**

15 A. Correct.

16 MS. HALLER: Object to the form.

17 **Q. (BY MR. BERNTSEN) Okay. And even though she**  
18 **hadn't been at work, the receipt of phone calls related**  
19 **to work caused you to diagnose her with work-related**  
20 **stress?**

21 MS. HALLER: Object to the form. You  
22 can answer.

23 A. I always get confused.

24 **Q. (BY MR. BERNTSEN) Yeah, you still answer.**

25 A. Yes.

## C E R T I F I C A T E

STATE OF WASHINGTON )  
COUNTY OF KING )

I, Patricia D. Jacoy, a Certified  
Shorthand Reporter in and for the State of Washington,  
do hereby certify that the foregoing transcript of the  
deposition of RACHEL (VARGAS) STERNOFF, ARNP taken on  
November 5, 2019 is true and accurate to the best of my  
knowledge, skill and ability.

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Patricia D. Jacoy, CSR 2348